

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

TAYLOR DUKE, *on behalf of herself and
similarly situated employees,*

Plaintiff,

v.

HARVEST HOSPITALITIES, INC., and
SATTAR SHAIK,

Defendants.

Civil Action No. 2:20-865-CCW

ALEXIS WILSON, KAITLIN
SHOEMAKER and GABRIELLE HAUZE,
*on behalf of themselves and similarly
situated employees,*

Plaintiffs,

v.

HARVEST HOSPITALITIES, INC.,
SATTAR SHAIK, HARVEST 568 INC.,
HARVEST 3405 INC. and HARVEST
3614 INC.,

Defendants.

Civil Action No. 2:22-744-CCW

NICOLE ROYAL, BENJAMIN REEVE,
JENNIFER RODRIGUEZ-LOPEZ, JUAN
SANCHEZ, YORK ALVARADO, and
GABRIELLE LAVALLE, *on behalf of
themselves and similarly situated
employees,*

Plaintiffs,

v.

HARVEST HOSPITALITIES, INC.,
HARVEST 2017, INC., HARVEST 2051,
INC., HARVEST 2085, INC., HARVEST
4694, and SATTAR SHAIK,

Defendants.

Civil Action No. 2:22-573-CCW

CLAUDIO MORALES, KYLE)	
KAMMER, DWIGHT L. CLARKE,)	
LAWRENCE C. SCOTT, JAMIE)	
SUTTON, JASMINE COOLEY, MEGAN)	
BOYER, <i>and</i>)	Civil Action No. 2:22-772-CCW
JESSICA JORDAN, <i>on behalf of</i>)	
<i>themselves and similarly situated</i>)	
<i>employees,</i>)	
)	
Plaintiffs,)	
)	
v.)	
)	
HARVEST HOSPITALITIES, INC.,)	
SATTAR SHAIK, HARVEST)	
ASSOCIATES INCORPORATED,)	
HARVEST PASADENA, INC.,)	
HARVEST-GAMBRILLS, INC.,)	
HARVEST KENT ISLAND, INC.,)	
HARVEST SALISBURY, INC.,)	
HARVEST OCEAN CITY, INC.,)	
HARVEST ONLEY, INC., HARVEST)	
MANASSAS MALL, INC., HARVEST)	
MANASSAS, INC., HARVEST 493, INC.,)	
HARVEST 591, INC., and HARVEST)	
575, INC.,)	
)	
Defendants.)	

**Plaintiffs’ Unopposed Motion for
Preliminary Approval of Class Action Settlement**

Pursuant to Federal Rule of Civil Procedure 23(e), the named plaintiffs in the above-captioned actions (the “Actions”) respectfully move this Court for preliminary approval of the class-action Settlement Agreement that has been reached in the Actions. The Settlement Agreement is attached to this motion as **Exhibit 1**.

For the reasons set forth in the accompanying memorandum of law, Plaintiffs respectfully ask the Court to (i) provisionally certify the proposed settlement class, (ii) preliminarily approve the settlement terms as fair, reasonable, and adequate, (iii) appoint Joseph H. Chivers of the law firm The Employment Rights Group, LLC, and Jeffrey W. Chivers and Theodore I. Rostow of

Chivers LLP as class counsel, (iv) appoint the named plaintiffs in the Actions (“Named Plaintiffs”) as class representatives, (v) preliminarily approve the enhancement payments agreed upon in the Settlement Agreement, (vi) approve Rust Consulting as the Settlement Administrator and preliminarily approve the costs of the settlement administration, (vii) endorse the proposed process for approval of attorneys’ fees and costs, (viii) approve the form of the Class Action Settlement Notice (attached to the Agreement as Exhibit F), which will be sent to all Class Members identified in Schedules A through D of the Settlement Agreement, (ix) set deadlines for exclusions and objections to the settlement, and (x) schedule a Fairness Hearing to take place no less than 100 days after the date of the Court’s preliminary approval order.

Defendant does not oppose this motion. A proposed order is attached.

Dated: June 28, 2022

By: s/ Joseph H. Chivers

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*Counsel for Plaintiffs
and all others similarly situated*